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7

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

10 CHUN-FANG ("FRANK") CHUNG

11 Plaintiff,

12 v.

13 VICKY CHUNG, *et al.*

14 Defendant(s).  
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Case No.: 2:17-cv-03402-DMG-KS

**NOTICE OF TENTATIVE  
SETTLEMENT**

Trial Date: May 1, 2018, 8:30 a.m.

1 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF  
2 RECORD: Pursuant to Federal Rule of Civil Procedure 23.1 and a notice from the  
3 Court dated, May 1, 2018, Plaintiff Chun-Fang (“Frank”) Chung respectfully submits  
4 this Notice of Tentative Settlement, as follows:

5 1. As set forth in the mediator’s report (ECF 32), the parties have reached a  
6 tentative settlement of this matter;

7 2. The parties’ tentative settlement, which is confidential, resolves not only  
8 the instant matter, but also a breach of contract action currently pending in the Los  
9 Angeles Superior Court, as well as litigation currently pending in Taiwan;

10 3. The parties’ tentative settlement is currently reflected on a term sheet,  
11 which shall be reduced to a final, long-form agreement within six weeks of the parties’  
12 April 26, 2018 mediation. That length of time is necessary due to the inherent  
13 complexities of a coordinated global settlement that requires input by the different  
14 parties and their respective counsel in different countries and under different laws;

15 4. Once the final, long-form agreement has been executed, the parties will  
16 submit the final, long-form agreement under seal to the Court for approval; and

17 5. Because the terms of the parties’ proposed settlement requires scheduled  
18 payments – including certain payments not due until six months after execution of the  
19 final, long-form agreement – Plaintiff expects the stipulated dismissal without  
20 prejudice contemplated by the parties’ proposed settlement will be filed no later than  
21 eight months from today’s date (*i.e.*, by January 1, 2019).

22  
23 Respectfully submitted.

24 Dated: May 1, 2018

By: /s/ Alan C. Chen  
Alan C. Chen  
Zachary S. Davidson  
ZUBER LAWLER & DEL DUCA LLP  
Attorneys for Plaintiff,  
Chun-Fang (“Frank”) Chung